



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007*

March 24, 2023

**BY ECF**

Hon. Jennifer H. Rearden  
United States District Judge  
United States District Court  
Daniel Patrick Moynihan Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**MEMO ENDORSED.**

Re: *United States v. Rutherford Tenants Corp.  
and James Ramadei*, 21 Civ. 10383 (JHR) (OTW)

Dear Judge Rearden,

This Office represents the United States in the above-referenced case. I write respectfully pursuant to the Court's Individual Rule of Practice 9.A, to obtain permission to file under seal certain information responsive to the Court's Notice of Reassignment dated March 10, 2023, which requested, inter alia, "[a]ny other information that the parties believe may assist the Court in advancing the case."

The United States seeks permission to file under seal the Addendum dated November 18, 2022, portions of which were also submitted to the Magistrate Judge in this case. The Addendum contains the following sensitive information relating to an individual's personal health, which the United States respectfully submits should not be filed on the public docket:

Exhibit A is excerpts from the deposition of Complainant, taken on September 28, 2022; pages 108-11 by Defendants, pages 191-96 by the Government.

Exhibit B is pages 1, 44-47 from the deposition of Dr. Adele Tutter, taken by Defendants on September 29, 2022.

Exhibit C is one page of notes from Dr. Theresa Yonker, dated September 7, 2022, produced to Defendants, and pages 1, 60-70 from the deposition of Dr. Theresa Yonker, taken by Defendants on December 8, 2022, which interprets the notes.

Letter to the Hon. Jennifer H. Rearden  
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Thank you for your consideration of this application.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

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Application **GRANTED** for the reasons stated in the motion. The Clerk of Court is respectfully directed to close ECF 53.

**SO ORDERED.**

A handwritten signature in blue ink, appearing to read 'Ona T. Wang', with a long horizontal flourish extending to the right.

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Ona T. Wang                      3/27/23  
U.S.M.J.